

JOSEPH T. MCNALLY  
Acting United States Attorney  
LINDSEY GREER DOTSON  
Assistant United States Attorney  
Chief, Criminal Division  
KEVIN J. BUTLER (Cal. Bar No. 329129)  
JENA A. MACCABE (Cal. Bar No. 316637)  
Assistant United States Attorneys  
Violent and Organized Crime Section  
1300 United States Courthouse  
312 North Spring Street  
Los Angeles, California 90012  
Telephone: (213) 894-6495/5046  
Facsimile: (213) 894-0141  
E-mail: kevin.butler2@usdoj.gov  
jena.maccabe@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISAIAH VILLASANA,

Defendant.

No. CR 23-563-MWF-4

AMENDED PLEA AGREEMENT FOR  
DEFENDANT  
ISAIAH VILLASANA

1. This constitutes the plea agreement between defendant ISIAH VILLASANA ("defendant") and the United States Attorney's Office for the Central District of California (the "USAO") in the above-captioned case. This agreement is limited to the USAO and cannot bind any other federal, state, local, or foreign prosecuting, enforcement, administrative, or regulatory authorities.

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:

a. At the earliest opportunity requested by the USAO and provided by the Court, appear and plead guilty to Count Three of the

1 indictment in United States v. ISIAIAH VILLASANA, CR No. 23-563-MWF-4,  
2 which charges defendant with Possess, Use, Carry, Brandish, and  
3 Discharge of a Short-Barreled Rifle in Furtherance of, and During and  
4 in Relation to, a Crime of Violence, in violation of 18 U.S.C.  
5 §§ 924(c) (1) (A) (ii), (c) (1) (A) (iii), (c) (1) (B) (i).

6 b. Not contest facts agreed to in this agreement.

7 c. Abide by all agreements regarding sentencing contained  
8 in this agreement.

9 d. Appear for all court appearances, surrender as ordered  
10 for service of sentence, obey all conditions of any bond, and obey  
11 any other ongoing court order in this matter.

12 e. Not commit any crime; however, offenses that would be  
13 excluded for sentencing purposes under United States Sentencing  
14 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not  
15 within the scope of this agreement.

16 f. Be truthful at all times with the United States  
17 Probation and Pretrial Services Office and the Court.

18 g. Pay the applicable special assessment at or before the  
19 time of sentencing unless defendant has demonstrated a lack of  
20 ability to pay such assessment.

21 h. Defendant agrees that any and all criminal debt  
22 ordered by the Court will be due in full and immediately. The  
23 government is not precluded from pursuing, in excess of any payment  
24 schedule set by the Court, any and all available remedies by which to  
25 satisfy defendant's payment of the full financial obligation,  
26 including referral to the Treasury Offset Program.

27 i. Complete the Financial Disclosure Statement on a form  
28 provided by the USAO and, within 30 days of defendant's entry of a

1 guilty plea, deliver the signed and dated statement, along with all  
2 of the documents requested therein, to the USAO by either email at  
3 usacac.FinLit@usdoj.gov (preferred) or mail to the USAO Financial  
4 Litigation Section at 300 North Los Angeles Street, Suite 7516, Los  
5 Angeles, CA 90012. Defendant agrees that defendant's ability to pay  
6 criminal debt shall be assessed based on the completed Financial  
7 Disclosure Statement and all required supporting documents, as well  
8 as other relevant information relating to ability to pay.

9 j. Authorize the USAO to obtain a credit report upon  
10 returning a signed copy of this plea agreement.

11 k. Consent to the USAO inspecting and copying all of  
12 defendant's financial documents and financial information held by the  
13 United States Probation and Pretrial Services Office.

14 3. Defendant further agrees:

15 a. To forfeit all right, title, and interest in and to  
16 any and all monies, properties, and/or assets of any kind, derived  
17 from or acquired as a result of, or used to facilitate the commission  
18 of, or involved in the illegal activity to which defendant is  
19 pleading guilty, specifically including, but not limited to, the  
20 following: one .223 caliber rifle bearing serial number P4FMBUS1P,  
21 and one round of .223 caliber ammunition seized on October 26, 2023  
22 (collectively, the "Forfeitable Assets").

23 b. To the Court's entry of an order of forfeiture at or  
24 before sentencing with respect to the Forfeitable Assets and to the  
25 forfeiture of the assets.

26 c. That the Preliminary Order of Forfeiture shall become  
27 final as to the defendant upon entry.

1           d. To take whatever steps are necessary to pass to the  
2 United States clear title to the Forfeitable Assets, including,  
3 without limitation, the execution of a consent decree of forfeiture  
4 and the completing of any other legal documents required for the  
5 transfer of title to the United States.

6           e. Not to contest any administrative forfeiture  
7 proceedings or civil judicial proceedings commenced against the  
8 Forfeitable Assets. If defendant submitted a claim and/or petition  
9 for remission for all or part of the Forfeitable Assets on behalf of  
10 himself or any other individual or entity, defendant shall and hereby  
11 does withdraw any such claims or petitions, and further agrees to  
12 waive any right he may have to seek remission or mitigation of the  
13 forfeiture of the Forfeitable Assets. Defendant further waives any  
14 and all notice requirements of 18 U.S.C. § 983(a)(1)(A) and/or  
15 requirements of the Government to commence forfeiture actions  
16 pursuant to 18 U.S.C. § 924(d)(1).

17           f. Not to assist any other individual in any effort  
18 falsely to contest the forfeiture of the Forfeitable Assets.

19           g. Not to claim that reasonable cause to seize the  
20 Forfeitable Assets was lacking.

21           h. To prevent the transfer, sale, destruction, or loss of  
22 the Forfeitable Assets to the extent defendant has the ability to do  
23 so.

24           i. That forfeiture of Forfeitable Assets shall not be  
25 counted toward satisfaction of any special assessment, fine,  
26 restitution, costs, or other penalty the Court may impose. With  
27 respect to any criminal forfeiture ordered as a result of this plea  
28 agreement, defendant waives: (1) the requirements of Federal Rules of

1 Criminal Procedure 32.2 and 43(a) regarding notice of the forfeiture  
2 in the charging instrument, announcements of the forfeiture at  
3 sentencing, and incorporation of the forfeiture in the judgment; (2)  
4 all constitutional and statutory challenges to the forfeiture  
5 (including by direct appeal, habeas corpus or any other means); and  
6 (3) all constitutional, legal, and equitable defenses to the  
7 forfeiture of the Forfeitable Assets in any proceeding on any grounds  
8 including, without limitation, that the forfeiture constitutes an  
9 excessive fine or punishment. Defendant acknowledges that the  
10 forfeiture of the Forfeitable Assets is part of the sentence that may  
11 be imposed in this case and waives any failure by the Court to advise  
12 defendant of this, pursuant to Federal Rule of Criminal Procedure  
13 11(b) (1) (J), at the time the Court accepts defendant's guilty plea.

14 THE USAO'S OBLIGATIONS

15 4. The USAO agrees to:

- 16 a. Not contest facts agreed to in this agreement.
- 17 b. Abide by all agreements regarding sentencing contained  
18 in this agreement.
- 19 c. At the time of sentencing, move to dismiss the  
20 remaining counts of the indictment as against defendant. Defendant  
21 agrees, however, that at the time of sentencing the Court may  
22 consider any dismissed charges in determining the applicable  
23 Sentencing Guidelines range, the propriety and extent of any  
24 departure from that range, and the sentence to be imposed.
- 25 d. At the time of sentencing, provided that defendant  
26 demonstrates an acceptance of responsibility for the offense up to  
27 and including the time of sentencing, recommend a two-level reduction  
28 in the applicable Sentencing Guidelines offense level, pursuant to

1 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an  
2 additional one-level reduction if available under that section.

3 NATURE OF THE OFFENSE

4 5. Defendant understands that for defendant be guilty of the  
5 crime charged in Count Three, that is, Possess, Use, Carry, Brandish,  
6 and Discharge of a Short-Barreled Rifle in Furtherance of, and During  
7 and in Relation to, a Crime of Violence, in violation of Title 18,  
8 United States Code, Sections 924(c)(1)(A)(ii), (c)(1)(A)(iii),  
9 (c)(1)(B)(i), the following must be true: first, the defendant  
10 committed the crime of interference by robbery, which is a crime of  
11 violence; and second, the defendant knowingly possessed a short-  
12 barreled rifle in furtherance of that crime or used, carried, or  
13 brandished a short-barreled rifle -- or discharged any firearm --  
14 during and in relation to that crime.

15 6. Defendant understands that defendant may be found guilty of  
16 the crime charged in Count Three, even if defendant personally did  
17 not commit the act or acts constituting the crime but aided and  
18 abetted in its commission. To "aid and abet" means intentionally to  
19 help someone else commit a crime. To prove defendant guilty by  
20 aiding and abetting, the government must prove each of the following  
21 beyond a reasonable doubt: first, someone else committed the crime;  
22 second, defendant aided, counseled, commanded, induced, or procured  
23 that person with respect to at least one element of the crime; third,  
24 defendant acted with the intent to facilitate the crime; and fourth,  
25 defendant acted before the crime was completed.

26 7. Each member of the conspiracy is responsible for the  
27 actions of the other conspirators performed during the course and in  
28 furtherance of the conspiracy. If one member of a conspiracy commits

1 a crime in furtherance of a conspiracy, the other members have also,  
2 under the law, committed that crime. Therefore, defendant may be  
3 found guilty of the crime charged in Count Three if the government  
4 has proved each of the following elements beyond a reasonable doubt:  
5 first, a person named in Count Three of the indictment committed the  
6 crime as alleged in that count; second, the person was a member of  
7 the conspiracy charged in Count One of the indictment; third, the  
8 person committed the crime charged in Count Three in furtherance of  
9 the conspiracy; fourth, defendant was a member of the same conspiracy  
10 at the time the offense charged in Count Three was committed; and  
11 fifth, the offense fell within the scope of the unlawful agreement  
12 and could reasonably have been foreseen to be a necessary or natural  
13 consequence of the unlawful agreement.

14 PENALTIES AND RESTITUTION

15 8. Defendant understands that the statutory maximum sentence  
16 that the Court can impose for a violation of Title 18, United States  
17 Code, Sections 924(c)(1)(A)(ii), (c)(1)(A)(iii), (c)(1)(B)(i) is:  
18 lifetime imprisonment; a five-year period of supervised release; a  
19 fine of \$250,000 or twice the gross gain or gross loss resulting from  
20 the offense, whichever is greatest; and a mandatory special  
21 assessment of \$100.

22 9. Defendant understands that the statutory mandatory minimum  
23 sentence that the Court must impose for a violation of Title 18,  
24 United States Code, Sections 924(c)(1)(A)(ii), (c)(1)(A)(iii),  
25 (c)(1)(B)(i) is: a 10-year term of imprisonment, which must run  
26 consecutive to any other sentence of imprisonment, and a mandatory  
27 special assessment of \$100.

1           10. Defendant understands that defendant will be required to  
2 pay full restitution to the victims of the offense to which defendant  
3 is pleading guilty. Defendant agrees that, in return for the USAO's  
4 compliance with its obligations under this agreement, the Court may  
5 order restitution to persons other than the victims of the offense to  
6 which defendant is pleading guilty and in amounts greater than those  
7 alleged in the counts to which defendant is pleading guilty. In  
8 particular, defendant agrees that the Court may order restitution to  
9 any victim of any of the following for any losses suffered by that  
10 victim as a result: (a) any relevant conduct, as defined in U.S.S.G.  
11 § 1B1.3, in connection with the offense to which defendant is  
12 pleading guilty; and (b) any counts dismissed pursuant to this  
13 agreement as well as all relevant conduct, as defined in U.S.S.G.  
14 § 1B1.3, in connection with those counts. The parties currently  
15 believe that the applicable amount of restitution is approximately  
16 \$13,050 but recognize and agree that this amount could change based  
17 on facts that come to the attention of the parties prior to  
18 sentencing.

19           11. Defendant understands that supervised release is a period  
20 of time following imprisonment during which defendant will be subject  
21 to various restrictions and requirements. Defendant understands that  
22 if defendant violates one or more of the conditions of any supervised  
23 release imposed, defendant may be returned to prison for all or part  
24 of the term of supervised release authorized by statute for the  
25 offense that resulted in the term of supervised release.

26           12. Defendant understands that, by pleading guilty, defendant  
27 may be giving up valuable government benefits and valuable civic  
28 rights, such as the right to vote, the right to possess a firearm,



1 the right to hold office, and the right to serve on a jury.  
2 Defendant understands that he is pleading guilty to a felony and that  
3 it is a federal crime for a convicted felon to possess a firearm or  
4 ammunition. Defendant understands that the convictions in this case  
5 may also subject defendant to various other collateral consequences,  
6 including but not limited to revocation of probation, parole, or  
7 supervised release in another case and suspension or revocation of a  
8 professional license. Defendant understands that unanticipated  
9 collateral consequences will not serve as grounds to withdraw  
10 defendant's guilty plea.

11 13. Defendant and his counsel have discussed the fact that, and  
12 defendant understands that, if defendant is not a United States  
13 citizen, the conviction in this case makes it practically inevitable  
14 and a virtual certainty that defendant will be removed or deported  
15 from the United States. Defendant may also be denied United States  
16 citizenship and admission to the United States in the future.  
17 Defendant understands that while there may be arguments that  
18 defendant can raise in immigration proceedings to avoid or delay  
19 removal, removal is presumptively mandatory and a virtual certainty  
20 in this case. Defendant further understands that removal and  
21 immigration consequences are the subject of a separate proceeding and  
22 that no one, including his attorney or the Court, can predict to an  
23 absolute certainty the effect of his convictions on his immigration  
24 status. Defendant nevertheless affirms that he wants to plead guilty  
25 regardless of any immigration consequences that his plea may entail,  
26 even if the consequence is automatic removal from the United States.

FACTUAL BASIS

14. Defendant admits that defendant is, in fact, guilty of the offense to which defendant is agreeing to plead guilty. Defendant and the USAO agree to the statement of facts provided below and agree that this statement of facts is sufficient to support a plea of guilty to the charge described in this agreement but is not meant to be a complete recitation of all facts relevant to the underlying criminal conduct or all facts known to either party that relate to that conduct.

On a date unknown, but at least as early as September 22, 2023, defendant agreed with co-conspirators, including his co-defendants, to commit interference with commerce by robbery. In furtherance of this conspiracy, the conspirators committed the following robberies, which affected interstate commerce.

On September 22, 2023, defendant and, at least, co-defendant one traveled to the Aloha Liquor Store located at 11837 Lakewood Boulevard, Downey, California to commit a robbery. Inside, co-defendant one held an employee at gunpoint, as co-defendant one pointed a short-barreled rifle at the employee and demanded cash. Inside Aloha Liquor, co-defendant one discharged the short-barreled rifle. Co-defendant one and defendant fled with approximately \$1,000 belonging to the Aloha Liquor Store. The business of Aloha Liquor affected interstate commerce and portions of the inventory of Aloha Liquor traveled in interstate commerce.

SENTENCING FACTORS

15. Defendant understands that in determining defendant's sentence the Court is required to calculate the applicable Sentencing Guidelines range and to consider that range, possible departures

1 under the Sentencing Guidelines, and the other sentencing factors set  
2 forth in 18 U.S.C. § 3553(a). Defendant understands that the  
3 Sentencing Guidelines are advisory only, that defendant cannot have  
4 any expectation of receiving a sentence within the calculated  
5 Sentencing Guidelines range, and that after considering the  
6 Sentencing Guidelines and the other § 3553(a) factors, the Court will  
7 be free to exercise its discretion to impose any sentence it finds  
8 appropriate between the mandatory minimum and up to the maximum set  
9 by statute for the crimes of conviction.

10 16. Except as set forth in paragraph 4 above, defendant and the  
11 USAO have no agreement as to the appropriate sentence or the  
12 applicable Sentencing Guidelines factors. Except as set forth in  
13 paragraph 4, both parties reserve the right to seek any sentence  
14 within the statutory maximum, and to argue for any criminal history  
15 score and category, base offense level, specific offense  
16 characteristics, adjustments, departures, and variances.

17 17. Defendant and the USAO reserve the right to argue for a  
18 sentence outside the sentencing range established by the Sentencing  
19 Guidelines based on the factors set forth in 18 U.S.C. § 3553(a)(1),  
20 (a)(2), (a)(3), (a)(6), and (a)(7).

21 WAIVER OF CONSTITUTIONAL RIGHTS

22 18. Defendant understands that by pleading guilty, defendant  
23 gives up the following rights:

- 24 a. The right to persist in a plea of not guilty.  
25 b. The right to a speedy and public trial by jury.  
26 c. The right to be represented by counsel -- and if  
27 necessary have the Court appoint counsel -- at trial. Defendant  
28 understands, however, that, defendant retains the right to be

1 represented by counsel -- and if necessary have the Court appoint  
2 counsel -- at every other stage of the proceeding.

3 d. The right to be presumed innocent and to have the  
4 burden of proof placed on the government to prove defendant guilty  
5 beyond a reasonable doubt.

6 e. The right to confront and cross-examine witnesses  
7 against defendant.

8 f. The right to testify and to present evidence in  
9 opposition to the charges, including the right to compel the  
10 attendance of witnesses to testify.

11 g. The right not to be compelled to testify, and, if  
12 defendant chose not to testify or present evidence, to have that  
13 choice not be used against defendant.

14 h. Any and all rights to pursue any affirmative defenses,  
15 Fourth Amendment or Fifth Amendment claims, and other pretrial  
16 motions that have been filed or could be filed.

17 WAIVER OF APPEAL OF CONVICTION

18 19. Defendant understands that, with the exception of an appeal  
19 based on a claim that defendant's guilty plea was involuntary, by  
20 pleading guilty defendant is waiving and giving up any right to  
21 appeal defendant's conviction on the offense to which defendant is  
22 pleading guilty. Defendant understands that this waiver includes,  
23 but is not limited to, arguments that the statutes to which defendant  
24 is pleading guilty are unconstitutional, and any and all claims that  
25 the statement of facts provided herein is insufficient to support  
26 defendant's plea of guilty.

WAIVER OF APPEAL

20. Defendant gives up the right to appeal all of the following: (a) the procedures and calculations used to determine and impose any portion of the sentence; (b) the term of imprisonment imposed by the Court, including, to the extent permitted by law, the constitutionality or legality of defendant's sentence, provided it is within the statutory maximum; (c) the fine imposed by the Court, provided it is within the statutory maximum; (d) the amount and terms of any restitution order; (e) the term of probation or supervised release imposed by the Court, provided it is within the statutory maximum; and (f) any of the following conditions of probation or supervised release imposed by the Court: the conditions set forth in Second Amended General Order 20-04 of this Court; the drug testing conditions mandated by 18 U.S.C. §§ 3563(a)(5) and 3583(d); and the alcohol and drug use conditions authorized by 18 U.S.C. § 3563(b)(7).

21. This agreement does not affect in any way the right of the USAO to appeal the sentence imposed by the Court.

WAIVER OF COLLATERAL ATTACK

22. Defendant also gives up any right to bring a post-conviction collateral attack on the conviction or sentence, including any order of restitution, except a post-conviction collateral attack based on a claim of ineffective assistance of counsel, a claim of newly discovered evidence, or an explicitly retroactive change in the applicable Sentencing Guidelines, sentencing statutes, or statutes of conviction. Defendant understands that this waiver includes, but is not limited to, arguments that the statutes to which defendant is pleading guilty are unconstitutional, and any and all claims that the

1 statement of facts provided herein is insufficient to support  
2 defendant's plea of guilty.

3 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

4 23. Defendant agrees that if the count of conviction is  
5 vacated, reversed, or set aside, both the USAO and defendant will be  
6 released from all their obligations under this agreement.

7 RESULT OF WITHDRAWAL OF GUILTY PLEA

8 24. Defendant agrees that if, after entering a guilty plea  
9 pursuant to this agreement, defendant seeks to withdraw and succeeds  
10 in withdrawing defendant's guilty plea on any basis other than a  
11 claim and finding that entry into this plea agreement was  
12 involuntary, then (a) the USAO will be relieved of all of its  
13 obligations under this agreement; and (b) should the USAO choose to  
14 pursue any charge that was either dismissed or not filed as a result  
15 of this agreement, then (i) any applicable statute of limitations  
16 will be tolled between the date of defendant's signing of this  
17 agreement and the filing commencing any such action; and  
18 (ii) defendant waives and gives up all defenses based on the statute  
19 of limitations, any claim of pre-indictment delay, or any speedy  
20 trial claim with respect to any such action, except to the extent  
21 that such defenses existed as of the date of defendant's signing this  
22 agreement.

23 EFFECTIVE DATE OF AGREEMENT

24 25. This agreement is effective upon signature and execution of  
25 all required certifications by defendant, defendant's counsel, and an  
26 Assistant United States Attorney.

BREACH OF AGREEMENT

26. Defendant agrees that if defendant, at any time after the signature of this agreement and execution of all required certifications by defendant, defendant's counsel, and an Assistant United States Attorney, knowingly violates or fails to perform any of defendant's obligations under this agreement ("a breach"), the USAO may declare this agreement breached. All of defendant's obligations are material, a single breach of this agreement is sufficient for the USAO to declare a breach, and defendant shall not be deemed to have cured a breach without the express agreement of the USAO in writing. If the USAO declares this agreement breached, and the Court finds such a breach to have occurred, then: (a) if defendant has previously entered a guilty plea pursuant to this agreement, defendant will not be able to withdraw the guilty plea, and (b) the USAO will be relieved of all its obligations under this agreement.

27. Following the Court's finding of a knowing breach of this agreement by defendant, should the USAO choose to pursue any charge that was either dismissed or not filed as a result of this agreement, then:

a. Defendant agrees that any applicable statute of limitations is tolled between the date of defendant's signing of this agreement and the filing commencing any such action.

b. Defendant waives and gives up all defenses based on the statute of limitations, any claim of pre-indictment delay, or any speedy trial claim with respect to any such action, except to the extent that such defenses existed as of the date of defendant's signing this agreement.

1 c. Defendant agrees that: (i) any statements made by  
2 defendant, under oath, at the guilty plea hearing (if such a hearing  
3 occurred prior to the breach); (ii) the agreed to factual basis  
4 statement in this agreement; and (iii) any evidence derived from such  
5 statements, shall be admissible against defendant in any such action  
6 against defendant, and defendant waives and gives up any claim under  
7 the United States Constitution, any statute, Rule 410 of the Federal  
8 Rules of Evidence, Rule 11(f) of the Federal Rules of Criminal  
9 Procedure, or any other federal rule, that the statements or any  
10 evidence derived from the statements should be suppressed or are  
11 inadmissible.

12 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

13 OFFICE NOT PARTIES

14 28. Defendant understands that the Court and the United States  
15 Probation and Pretrial Services Office are not parties to this  
16 agreement and need not accept any of the USAO's sentencing  
17 recommendations or the parties' agreements to facts or sentencing  
18 factors.

19 29. Defendant understands that both defendant and the USAO are  
20 free to: (a) supplement the facts by supplying relevant information  
21 to the United States Probation and Pretrial Services Office and the  
22 Court and (b) correct any and all factual misstatements relating to  
23 the Court's Sentencing Guidelines calculations and determination of  
24 sentence. While this paragraph permits both the USAO and defendant  
25 to submit full and complete factual information to the United States  
26 Probation and Pretrial Services Office and the Court, even if that  
27 factual information may be viewed as inconsistent with the facts  
28 agreed to in this agreement, this paragraph does not affect



1 defendant's and the USAO's obligations not to contest the facts  
2 agreed to in this agreement.

3 30. Defendant understands that even if the Court ignores any  
4 sentencing recommendation, finds facts or reaches conclusions  
5 different from those agreed to, and/or imposes any sentence up to the  
6 maximum established by statute, defendant cannot, for that reason,  
7 withdraw defendant's guilty plea, and defendant will remain bound to  
8 fulfill all defendant's obligations under this agreement. Defendant  
9 understands that no one -- not the prosecutor, defendant's attorney,  
10 or the Court -- can make a binding prediction or promise regarding  
11 the sentence defendant will receive, except that it will be between  
12 the statutory mandatory minimum and within the statutory maximum.

13 NO ADDITIONAL AGREEMENTS

14 31. Defendant understands that, except as set forth herein,  
15 there are no promises, understandings, or agreements between the USAO  
16 and defendant or defendant's attorney, and that no additional  
17 promise, understanding, or agreement may be entered into unless in a  
18 writing signed by all parties or on the record in court.

19 //

20 //

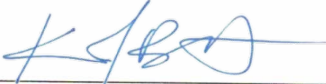
PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

32. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED

UNITED STATES ATTORNEY'S OFFICE  
FOR THE CENTRAL DISTRICT OF  
CALIFORNIA

JOSEPH T. MCNALLY  
Acting United States Attorney


  
\_\_\_\_\_  
KEVIN J. BUTLER  
JENA A. MACCABE  
Assistant United States Attorneys

3/28/2025

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
ISAIAH VILLASANA  
Defendant


3/28/25  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
CARLOS L. JUAREZ  
Attorney for Defendant ISAIAH  
VILLASANA

3/28/2025  
\_\_\_\_\_  
Date

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charge and wish to take advantage of the promises set forth in this agreement, and not for any other reason.

  
\_\_\_\_\_  
ISAIAH VILLASANA  
Defendant

3/28/25  
\_\_\_\_\_  
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am ISAIAH VILLASANA's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is an informed and voluntary one; and the factual basis set forth in this agreement is sufficient to support my client's entry of a guilty plea pursuant to this agreement.

CARLOS L. JUAREZ  
Attorney for Defendant ISAIAH  
VILLASANA

3/28/2025  
Date